

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Youba Kande BARADJI

Case No.

542
2:18-mj-436-50

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2018 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

1. 21 USC Section 841(a)1

Manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, controlled substances

2. 21 USC Section 846

Conspiracy to distribute, or possess with intent to distribute, controlled substances

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

James H. Gore, Task Force Officer DEA

Printed name and title

Sworn to before me and signed in my presence.

Date:

7-24-18



Judge's signature

City and state:

Columbus, Ohio

Chelsey Vascura

Printed name and title

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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE AFFIDAVIT IN SUPPORT OF
ARREST WARRANT**

UNITED STATES OF AMERICA

V.

YOUBA KANDE BARADJI

Case No:

**Magistrate Judge
Chelsey Vascura**

UNDER SEAL

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

Now before the Honorable Chelsey Vascura, Magistrate Judge, appears the affiant, James Gore, who, being duly cautioned and sworn, deposes and states that he believes probable cause exists to warrant the arrest of Youba Kande BARADJI. The facts and circumstances regarding this matter are as follows:

INTRODUCTION AND AFFIANT'S BACKGROUND

1. The affiant, James Gore, has been a sworn law enforcement officer for more than 14 ½ years, and is presently employed as a Special Agent with the Ohio Bureau of Criminal Investigation (BCI). The affiant has been a BCI agent assigned to the Special Operations Division for more than 3 years. The affiant is also presently assigned to the Columbus District Office of the United States Drug Enforcement Administration (DEA) Tactical Diversion Squad (TDS) as a Task Force Officer (TFO), and has worked in this capacity since approximately October, 2017. As such, the affiant is an "investigative or law enforcement officer" of the United States within the meaning of Title 18 U.S.C. § 2510(7), empowered by law to conduct criminal investigations and make arrests for offenses enumerated in the Controlled

Substances Act (CSA), Title 21 U.S.C. Prior to his current assignment as a BCI Special Agent, the affiant was a police officer in Florida for 11 ½ years, where he served as a patrol officer, criminal investigator, and vice and narcotics detective, among other assignments. The affiant has conducted and participated in a wide variety of criminal investigations, and has received extensive training in a variety of law enforcement topics, including, but not limited to, drug offenses, criminal gangs, homicides, and other crimes of violence.

2. This affidavit is based upon TFO Gore's personal knowledge of the facts and circumstances surrounding this investigation, a review of governmental records, and information shared with him by other law enforcement investigators, to include Agent Chris Young, of the United States Customs and Border Protection (CBP – Border Patrol), and Trooper Michael Eckhardt, of the Oklahoma Highway Patrol (OHP). The information contained herein does not describe the entirety of this investigation, but sets forth only those facts necessary to establish probable cause.

PROBABLE CAUSE

3. For approximately seven months, Detroit Sector Border Patrol Agents along with Columbus, Ohio DEA Agents and Task Force Officers assigned to the DEA, have been investigating a Columbus-based Drug Trafficking Organization (DTO) involved in the distribution and trafficking of large quantities of Methamphetamine and Marijuana in Central Ohio.
4. On January 26, 2018, Trooper Michael Eckhardt, of the Oklahoma Highway Patrol, stopped Youba BARADJI for speeding on Interstate 40. BARADJI was operating a white Ford Escape with Minnesota tag 273XGC. Records indicate that this vehicle was rented in Columbus, Ohio by a third party that is not believed to be involved in the smuggling of

Methamphetamine. During the course of the vehicle stop, 8 gross lbs. of Crystal Methamphetamine and 9 gross lbs. of Marijuana were discovered and seized by Oklahoma Highway Patrol. Documents seized from BARADJI (including food receipts, hotel cards, and financial receipts) indicate that he spent approximately five days in California prior to the traffic stop in Oklahoma.

5. The Methamphetamine and Marijuana seized from BARADJI subsequently tested positive as such. The laboratory testing and documentation were performed by the Oklahoma State Bureau of Investigation.
6. Verifiable information from a cooperating defendant indicated that the seized drugs were to be delivered to its purchaser, Jacques DIALLO (alias "Baba"), of Columbus, Ohio. The cooperating defendant further revealed that Jacques DIALLO, receives his Methamphetamine directly from a Mexican source of supply, Jose RODRIGUEZ JIMENEZ (alias "Renner"), who operates out of California. Additionally, the cooperating defendant informed investigators that Jose RODRIGUEZ JIMENEZ was working directly with another Columbus-based, known drug trafficker, Cedric McBRIDE (alias "Demba"), to move Cocaine from Los Angeles, California to Columbus.
7. Columbus is located within the Southern District of Ohio, and thus falls under the jurisdiction of this Court.

CONCLUSION

8. Based on the facts set forth in this Affidavit, TFO James Gore asserts that there is probable cause to believe that Youba BARADJI willfully and unlawfully possessed 8 gross lbs. of Crystal Methamphetamine and 9 gross lbs. of Marijuana in violation of 21 U.S.C. § 841(a)1,

and that Jacques DIALLO, Cedric McBRIDE, and Youba BARADJI, along with others known and unknown, are engaged in a conspiracy to distribute, or possess with intent to distribute, controlled substances in the Southern District of Ohio, in violation of 21 U.S.C. § 846.



James Gore, Drug Enforcement Administration Task Force Officer

Sworn to and subscribed before me this 24 day of July, 2018, at 1:45 AM (PM).



CHELSEY VASCURA, UNITED STATES MAGISTRATE JUDGE